961474

The Selmer Company
Post Office Box 310 · Elkhart, Indiana 46515 · 219·522·1675

February 12, 1988

United States Environmental
Protection Agency
930 S. Dearborn St.
Chicago, IL 60604
Attn: Cindy Nolan

Ms. Cindy Nolan,

In reference to our phone conversation about taking core samples in an area where we had a fuel oil storage tank removed.

Here is documentation concerning the removal of that tank and soil sample results.

Concerning the TCE, we have a still in use through which we filter our degreasing fluid and reuse it.

I trust this information will help you with your task. If I can be of help in any way, please let me know.

Sincerely,

Edward E. Ferguson

Edward E. Ferguson

00002722

The Selmer Company
Post Office Box 310 · Elkhart, Indiana 46515 · 219·522·1675

February 12, 1988

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930 S. Dearborn St.
Chicago, IL 60604
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Edward E. Ferguson

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EIS ENVIRONMENTAL ENGINEERS, INC.
1701 North Ironwood Drive • South Bend, Indiana 46635 • 219/277-5715

August 7, 1986

Mr. Bob Reed
Box 310
Elkhart, IN 46515

Dear Mr. Reed:

Enclosed are the results of the soil analysis for Volatile Organic Compounds (VOC) performed on soil samples collected from the bottom of an excavated No. 2 diesel fuel tank storage pit on June 23, 1986.

A preliminary screening of the excavated pit was performed at the site using a photoionization detector (PID) capable of detecting VOC in soil. Approximately 20 cubic yards of material was determined to contain some contamination as result of some spillage when the connection lines leading from the tank were broken during removal. Approximately 1.0 liter of fuel was spilled at the site. The soil that received the spillage was removed from the pit and the area was tested with the PID until no VOC's were detected.

The results of the laboratory analysis detected a trace amount of Toluene and Xylene. However, the concentration of these contaminants are well below the USEPA recommended maximum contaminant levles for organic contaminants in drinking water. RMCL's for these contaminants have not been established for soil.

	Concentration (ppm)		RMCL (ppm)
	#1 East	#2 West	
Toluene	0.003	0.005	2.0
Xylene	0.002	N.D.	0.44

N.D. - None Detected (detection limit was 0.002 ppm)

RMCL - Recommended Maximum Contaminant Levels for organic contaminants from 40 CFR part 141.50

Sincerely,

EIS ENVIRONMENTAL ENGINEERS, INC.

Jeff L. Ward

JLW:ldp

Enclosure

EIS ENVIRONMENTAL ENGINEERS, INC.
1701 North Ironwood Drive • South Bend, Indiana 46635 • Telephone (219) 277-5715

VOLATILE ORGANIC COMPOUND (VOC) ANALYSIS REPORT

Client: The Selmer Company
1119 N. Main Street
Elkhart, IN

P.O. # _____

Sample ID:
Soils from Tank Pit
#1 - East-22' deep
#2 - West-20' deep

Date Reported:
EIS Lab No.: 2327 F, 2328 F
Sample Date: 6-23-86
Date Received: 6-23-86
Date Analyzed: 7-3-86
Samples Received
Refrigerated: Yes X No___
In 40cc Vials: Yes X No___
Air Space: Yes X No___

RESULTS

- The test procedures used for this analysis, and the listing of compounds detectable by these procedures, are described in Table 1 on the reverse side of this report sheet.
- If your sample contained any of the Table 1 Volatile Organic Compounds above a Quantifiable Detection Limit of _____µg/l, these compounds are reported below. If no Table 1 Volatile Organic Compounds were detected, then a statement to this effect is listed below.
- Results are as follows:

The only Table 1 solvents found in these samples were Toluene and Xylene at the levels shown below:

Parameter	Concentration (ppm)	
	#1	#2
Toluene	0.003	0.005
Xylene	0.002	N.D.

The term N.D. means Not Detected. The detection limit for this analysis was 0.002 ppm.

Linda Fozite
LABORATORY DIRECTOR

Sheet 1 of 1

Project No. 1319-01

SURFACE SOIL SAMPLE LOG

Client SELMER Co. Site Location 1119 N. MAIN ELK IND.

Sample Location REAR PARKING LOT NEAR SW BLDG CNR.

Date 6-23-86 Time 11:00AM

Sample Location Description/Designation 2 SAMPLES FROM EAST AND WEST TANK PIT BOTTOM AT APPROX. 20' DEEP IN MED COARSE ORN SAND.

SAMPLE COLLECTION:

Equipment Used BACK HOE USED TO MAKE HOLE, SAMPLED FROM PIT FLOOR

Number of Samples Collected 2 Container Size 40cc VIAL

Sample No.	Depth	Type of Material	EIS Lab No.	Analysis Request
#1	22'	SAND	2327F	VOC
#2	20'	"	2328F	VOC

COMMENTS PID CHECK WAS PERFORMED. NO VOC'S DETECTED IN EXCAVATED PIT

SHIPPING BOX NO. _____

COLLECTOR'S NAME J Ward

CHAIN OF CUSTODY RECORD – EIS ENVIRONMENTAL ENGINEERS INC

Project No:	Project Name
1319-01	THE SELMER Co.

Samplers: (Signature) J S Ward

Sta.No.	Date	Time	Comp	Grab	Station Location	Quantity of Containers	ANALYSIS VOC	Remarks	EIS LAB USE ONLY I=Intact B=Broken: Sample State	Tape
#1	6-23-8[illegible]	11:00		X	EAST	1	X			
#2	"	"		X	WEST	1	X			

Relinquished by:	Date	Time	Received by:	Relinquished by:	Date	Time	Received by:		
J. WARD	6-23-8[illegible]	5:00p	Julia Ward						
Relinquished by:	Date	Time	Received by:	Relinquished by:	Date	Time	Received by:		

Mode of Transportation	EIS Vehicle	Public Transportation
CAR	#2	Carrier: Way or Air Bill No.

00002717

EIS ENVIRONMENTAL ENGINEERS, INC.
1701 North Ironwood Drive • South Bend, Indiana 46635 • 219/277-5715

August 7, 1986

Mr. Bob Reed
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Elkhart, IN 46515

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	#1 East	#2 West	
Toluene	0.003	0.005	2.0
Xylene	0.002	N.D.	0.44

N.D. - None Detected (detection limit was 0.002 ppm)

RMCL - Recommended Maximum Contaminant Levels for organic contaminants from 40 CFR part 141.50

Sincerely,

EIS ENVIRONMENTAL ENGINEERS, INC.

Jeff L. Ward

JLW:ldp

Enclosure

00002718

EIS ENVIRONMENTAL ENGINEERS, INC.

1701 North Ironwood Drive • South Bend, Indiana 46635 • Telephone (219) 277-5715

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Client: The Selmer Company
1119 N. Main Street
Elkhart, IN

P.O. # _____

Sample ID:
Soils from Tank Pit
#1 - East-22' deep
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Date Reported:
EIS Lab No.: 2327 F, 2328 F
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Refrigerated: Yes X No ___
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Cindi Fozite
LABORATORY DIRECTOR

Project No. 1319-01

SURFACE SOIL SAMPLE LOG

Client SELMER CO. Site Location 1119 N. MAIN ELK IND.

Sample Location REAR PARKING LOT NEAR SW BLDG CORN.

Date 6-23-86 Time 11:00AM

Sample Location Description/Designation 2 SAMPLES FROM EAST AND WEST TANK PIT BOTTOM AT APPROX. 20' DEEP IN MED COARSE GRN SAND.

SAMPLE COLLECTION:

Equipment Used BACK HOE USED TO MAKE HOLE, SAMPLED FROM PIT FLOOR

Number of Samples Collected 2 Container Size 40cc VIAL

Sample No.	Depth	Type of Material	EIS Lab No.	Analysis Request
#1	22'	SAND	2327F	VOC
#2	20'	"	2328F	VOC

COMMENTS PID CHECK WAS PERFORMED. NO VOC'S DETECTED IN EXCAVATED PIT

SHIPPING BOX NO. _____

COLLECTOR'S NAME J Ward

CHAIN OF CUSTODY RECORD – EIS ENVIRONMENTAL ENGINEERS INC

Project No:	Project Name
89-01	THE SELMER Co.

Samplers: (Signature) J S Ward

Sta.No.	Date	Time	Comp	Grab	Station Location	Quantity of Containers	ANALYSIS VOC	Remarks	EIS LAB USE ONLY: Sample State (I=Intact B=Broken)	EIS LAB USE ONLY: Tape
#1	6-23-89	11:00		X	EAST	1	X			
#2	"	"		X	WEST	1	X			

Relinquished by:	Date	Time	Received by:	Relinquished by:	Date	Time	Received by:		
J. WARD	6-23-89	5:00p	Julia Ward						
Relinquished by:	Date	Time	Received by:	Relinquished by:	Date	Time	Received by:		

Mode of Transportation	EIS Vehicle	Public Transportation
CAR	#2	Carrier: Way or Air Bill No.

00002716

WARNER and SONS, INC.

Demolition and Excavating Contractors

29099 U.S. 33 W.

POST OFFICE BOX 87 ELKHART, INDIANA 46515

PHONE: (Elkhart) (219) 293-9724
293-3547

INVOICE APPROVED 7-14-86

SELMER COMPANY
1119 NORTH MAIN
ELKHART, INDIANA 46514

PROPOSAL

ATTENTION: MR. CECIL ZIMMERMAN.

MAY 1ST, 19 86.

Dear Sir:

The undersigned proposes to furnish all materials and perform all labor necessary to complete the following if required:

P.O. 43980

REFERENCE: REMOVAL OF 8,000 GALLON UNDERGROUND FUEL TANK.

FURNISH ALL LABOR, EQUIPMENT, AND MATERIALS NECESSARY TO PERFORM THE FOLLOWING WORK:

1. CUT ASPHALT IN AREA OF TANK.
2. REMOVE AND DISPOSE OF ASPHALT ABOVE TANK AREA OFF SITE.
3. DIG DOWN AND PULL TANK OUT OF GROUND.
4. HAUL TANK AWAY AND LEGALLY DISPOSE OF.
5. PROVIDE GEOLOGIST WITH EQUIPMENT TO TEST FOR POSSIBLE CONTAMINATION.
6. TAKE (3) THREE SOIL SAMPLES AND PROVIDE ANALYSIS TO SELMER.
7. BACKFILL WITH MATERIAL FROM ON SITE AND COMPACT.
8. PLACE (4") FOUR INCH LAYER OF SUBBASE MATERIAL IN PATCH AREA.

TOTAL : $4,901.80

NOTE * * * * * *

IT IS ASSUMED THERE HAS BEEN NO CONTAMINATION AND THE QUOTED PRICE IS BASED ON THIS. SHOULD CONTAMINATION BE FOUND AND ADDITIONAL TESTING, EXCAVATING, BACKFILL, OR OTHER WORK BE NECESSARY, IT WILL BE HANDLED AS AN EXTRA TO THE CONTRACT. PRICE TO BE DETERMINED AT TIME FULL EXTENT OF EXTRA IS REALIZED.

All of the above work to be completed in a substantial and workmanlike manner for the sum of FOUR THOUSAND, NINE HUNDRED & ONE DOLLARS AND 80/100----- ($ $4,901.80*) **Dollars.**

Payments to be made PER INVOICE **as the work progresses to the value of** $4,901.80 (100 %) **per cent of all work completed. The entire amount of contract to be paid within** 30 **days after completion.**

Any alteration or deviation from the above specifications involving extra cost of material or labor will only be executed upon written orders for same, and will become an extra charge over the sum mentioned in this contract. All agreements must be made in writing.

The Contractor agrees to carry Workmen's Compensation and Public Liability Insurance, also to pay all Sales Taxes, Old Age Benefit and Unemployment Compensation Taxes upon the material and labor furnished under this contract, as required by the United States Government and the State in which this work is performed.

Respectfully submitted,

Mark A. Weaver

MARK A. WEAVER **Contractor**
WARNER & SONS, INC.

NOTE: This proposal may be withdrawn by Warner and Sons, Inc. if not accepted within 60 **days.**

MAW/pw

ACCEPTANCE

You are hereby authorized to furnish all materials and labor required to complete the work mentioned in the above proposal, for which the undersigned agrees to pay the amount mentioned in said proposal, and according to the terms thereof.

Cecil Zimmerman

Date 6-2 19 86

WARNER and SONS, INC.

Demolition and Excavating Contractors

29099 U.S. 33 W.
POST OFFICE BOX 87 ELKHART, INDIANA 46515
PHONE: (Elkhart) (219) 293-9724
293-3547

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Date 6-2 19 86

The Selmer Company
Post Office Box 310 · Elkhart, Indiana 46515 · 219·522·1675

December 6, 1982

Mr. Ralph C. Pickard
Technical Secretary
State of Indiana
Environmental Management Board
1330 West Michigan Street
P. O. Box 1964
Indianapolis, Indiana 46206

Dear Mr. Pickhard:

Pursuant to your letter of November 17, 1982 regarding trichloroethylene (TCE) contamination of the City of Elkhart well field, we are enclosing the information you requested covering the use of TCE at Selmer's Main Street plant.

1. We do not know when the use of TCE was initiated at our facility, but it has been used at least since 1947. Selmer has operated this facility since 1927. Selmer retains purchase documents for a period of five (5) years and based on those documents annual purchases of TCE for the past five years and nine months are as follows:

1982 (through 9/30/82)	1484.5 gallons
1981	1728.6 gallons
1980	2130.1 gallons
1979	2691.4 gallons
1978	1805.0 gallons
1977	2113.9 gallons

2. We have no knowledge of the activities of prior manufacturers at or owners of the site.

3. TCE is used in a vapor degreaser for degreasing metal musical instrument parts. TCE is delivered by tank truck, pumped directly into an approved 300-gallon above-ground storage tank, which is located outside the building on a concrete pad. Piping from the tank carries the TCE directly into the degreaser. When the degreaser is cleaned, remaining TCE and sludge is drained into 55-gallon drums which are then stored inside the plant until sufficient quantities have accumulated for pickup. When they are picked up by our suppliers (1981 to present: Zolo Shield Solvent, 2263 Distribution Drive, Indianapolis, Indiana 46241) (prior to 1981: Van Waters & Rogers, 59685 Market Street, South Bend, Indiana 46613) for distillation and recovery of solvent. In the past five years and nine months the following amounts of TCE have been returned to our suppliers for recycling:

1982 (through 9/30/82)	330 gallons
1981	660 gallons
1980	220 gallons
1979	715 gallons
1978	220 gallons
1977	935 gallons

Interviews with employees involved with the purchase, use and disposal of TCE indicate that it has always been the policy and practice of The Selmer Company to dispose of all used TCE by returning it to the supplier for recycling.

4. We have no knowledge or evidence that there has ever been any significant spill or disposal of TCE on site.

I hope that this information we have volunteered will aid the Board in identifying the party responsible for the contamination of the Elkhart well field and taking prompt action to remedy the problem.

Very truly yours,

H. William Petersen
President

cc: Mr. James E. Traylor

The Selmer Company
Post Office Box 310 · Elkhart, Indiana 46515 · 219 · 522-1675

Environmental Management Board Requests: 11/24/82

(1) It is impossible to document the use of TCE at this facility since its use was initiated, as records prior to 1976 are no longer in existence. Some sketchy records from 1973, 1974 and 1975 were located and these figures are listed on the attached exhibits. Records from late 1976 through the present are complete and attached. TCE has been used since the 1930's but at no time did the usage exceed 3,000 gallons per year. A reasonable assumption would be that usage was much smaller in the past.

(2) The Selmer Company has been occupying this site since 1927. If owners previous to that year were users of TCE is not known.

(3) TCE is used for degreasing purposes only at this location. Only one vapor degreaser is in operation. The material is delivered by truck and pumped directly into an approved storage tank. Piping from the tank conveys the material direct into the degreaser. Contaminated TCE and sludge are drained from the degreaser into metal drums which are then picked up by the supplier for distillation and recovery of solvent. The attached exhibits list these returns.

(4) No spills of any kind have ever been recorded and an on-site dump has never been used.

TRICHLOROETHYLENE

VAN WATERS & ROGERS

Date	Gals Rec'd	Gals - Sludge Ret'd
2-6-73	161	
2-16-73		55
2-19-73		55
2-27-73	175	
3-29-73		110
4-2-73	228	
4-23-73	150	
5-24-73		55
5-31-73		55
5-30-73	263	
6-26-73		55
6-27-73	234	
3-15-74		110
6-19-74		55
3-24-75	110	
8-5-75		55

TRICHLOROETHYLENE

VAN WATERS & ROGERS

Date	Gals Rec'd	Gals-Sludge Ret'd
9-20-76		55
10-12-76		165
11-12-76		110
12-13-76	205	
2-9-77	284	
3-13-77		110
3-24-77	256	
5-2-77	266	
6-20-77		110
6-23-77	282	
6-30-77		220
7-19-77		165
8-3-77	224	
9-9-77		110
9-20-77	286	
10-18-77		110
11-2-77	279.9	
12-13-77	236	
12-16-77		110
2-10-78		55
3-16-78	284	
4-11-78		55
5-13-78	265	
5-23-78		110
6-15-78	282	
8-8-78	268	
9-22-78	275	
11-6-78	287	
12-5-78	144	
1-23-79	259	
3-5-79	282	
4-16-79	54	
4-20-79	282	
6-1-79	54	
6-5-79	247	
6-26-79		110
6-27-79		220
6-29-79		110
7-20-79	244	
8-28-79	108	
8-29-79		110
9-4-79	282	
10-5-79	189	
11-13-79	305	
10-16-79		55
11-6-79		110
12-17-79	108	

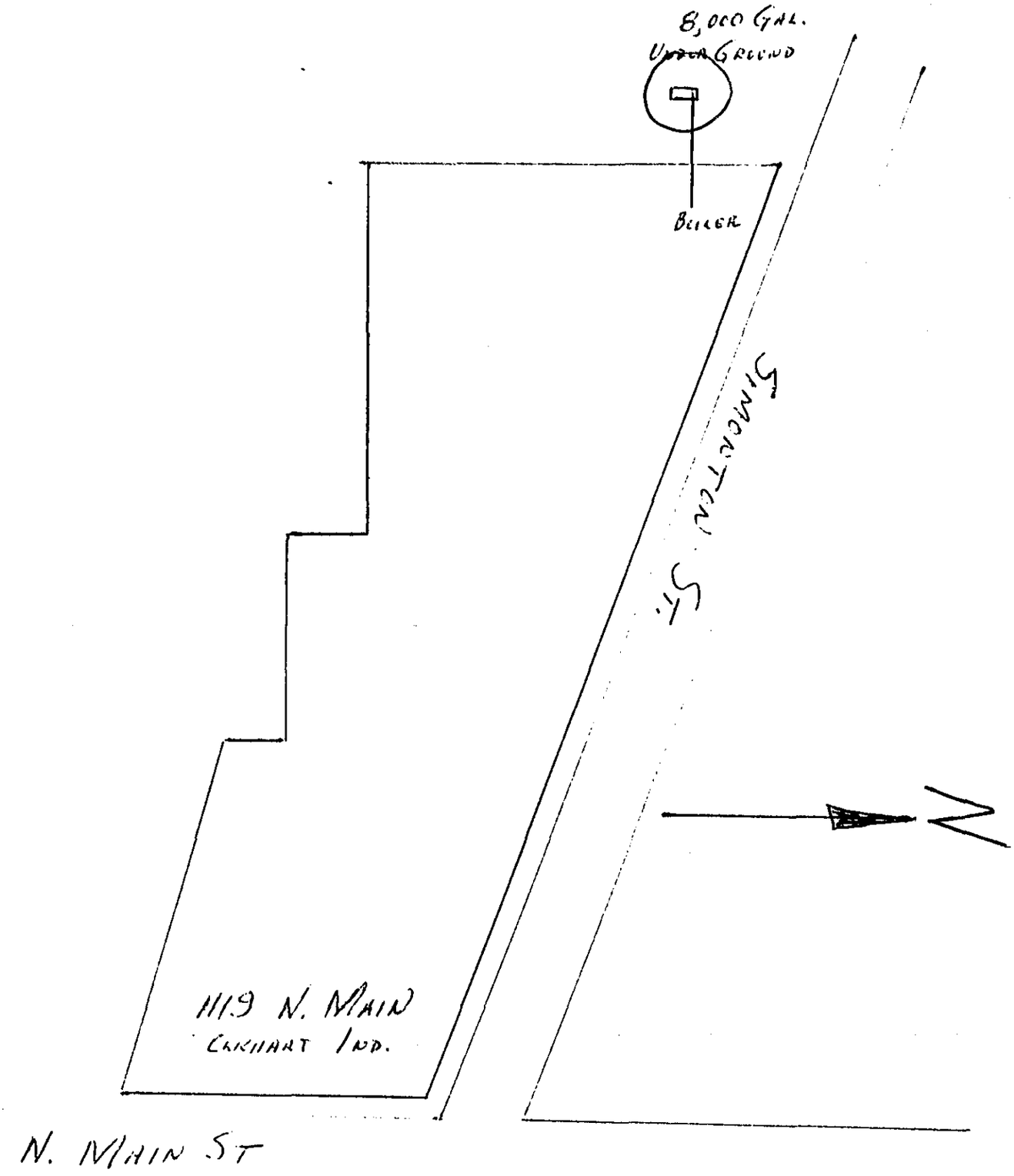
Date	Rec'd	Ret'd
12-26-79	277.4	
2-8-80	108	
2-11-80		165
2-12-80	301.5	
4-17-80	110	
5-7-80	257	
6-5-80		55
6-19-80	110	
6-23-80	254	
7-29-80	156.5	
8-20-80	270	
9-10-80	160	
10-16-80	110	
10-28-80	293.1	
2-17-81		330
2-18-81	162	
3-16-81	162	
5-4-81	216	
5-21-81	108	
6-11-81	108	

TRICHLOROETHYLENE

GOLD SHEILD CHEMICALS

Date	Gals Rec'd	Gals-Sludge Ret'd
7-1-81	299	
8-20-81	162.4	
9-10-81	126.7	
11-3-81		330
11-5-81	246.2	
12-9-81	138.3	
1-22-82	206.6	
3-5-82	160.3	
3-25-82	245.0	
3-30-82	108	
4-21-82	126.5	
5-11-82		330
6-3-82	274.3	
7-13-82	91.8	
8-10-82	121.2	
9-20-82	150.8	

The Selmer Company
Post Office Box 310 · Elkhart, Indiana 46515 · 219-522-1675



The Selmer Company
Post Office Box 310 · Elkhart, Indiana 46515 · 219·522·1675

December 6, 1982

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1330 West Michigan Street
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H. William Petersen
President

cc: Mr. James E. Traylor

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Post Office Box 310 · Elkhart, Indiana 46515 · 219 522 1675

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(4) No spills of any kind have ever been recorded and an on-site dump has never been used.

TRICHLOROETHYLENE

VAN WATERS & ROGERS

Date	Gals Rec'd	Gals - Sludge Ret'd
2-6-73	161	
2-16-73		55
2-19-73		55
2-27-73	175	
3-29-73		110
4-2-73	228	
4-23-73	150	
5-24-73		55
5-31-73		55
5-30-73	263	
6-26-73		55
6-27-73	234	
3-15-74		110
6-19-74		55
3-24-75	110	
8-5-75		55

TRICHLOROETHYLENE

VAN WATERS & ROGERS

Date	Gals Rec'd	Gals-Sludge Ret'd
9-20-76		55
10-12-76		165
11-12-76		110
12-13-76	205	
2-9-77	284	
3-13-77		110
3-24-77	256	
5-2-77	266	
6-20-77		110
6-23-77	282	
6-30-77		220
7-19-77		165
8-3-77	224	
9-9-77		110
9-20-77	286	
10-18-77		110
11-2-77	279.9	
12-13-77	236	
12-16-77		110
2-10-78		55
3-16-78	284	
4-11-78		55
5-13-78	265	
5-23-78		110
6-15-78	282	
8-8-78	268	
9-22-78	275	
11-6-78	287	
12-5-78	144	
1-23-79	259	
3-5-79	282	
4-16-79	54	
4-20-79	282	
6-1-79	54	
6-5-79	247	
6-26-79		110
6-27-79		220
6-29-79		110
7-20-79	244	
8-28-79	108	
8-29-79		110
9-4-79	282	
10-5-79	189	
11-13-79	305	
10-16-79		55
11-6-79		110
12-17-79	108	

Date	Rec'd	Ret'd
12-26-79	277.4	
2-8-80	108	
2-11-80		165
2-12-80	301.5	
4-17-80	110	
5-7-80	257	
6-5-80		55
6-19-80	110	
6-23-80	254	
7-29-80	156.5	
8-20-80	270	
9-10-80	160	
10-16-80	110	
10-28-80	293.1	
2-17-81		330
2-18-81	162	
3-16-81	162	
5-4-81	216	
5-21-81	108	
6-11-81	108	

00002712

TRICHLOROETHYLENE

GOLD SHEILD CHEMICALS

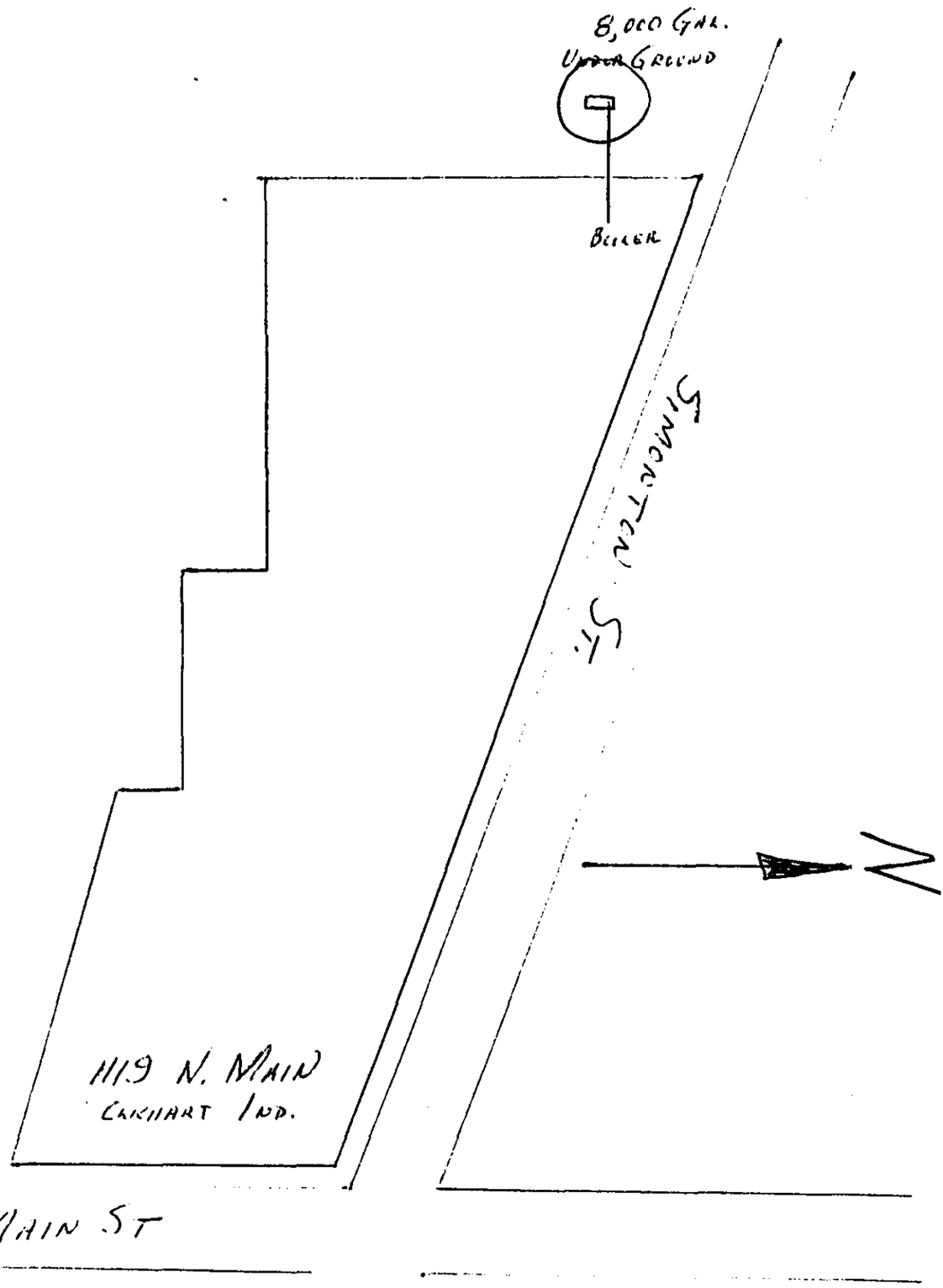
Date	Gals Rec'd	Gals-Sludge Ret'd
7-1-81	299	
8-20-81	162.4	
9-10-81	126.7	
11-3-81		330
11-5-81	246.2	
12-9-81	138.3	
1-22-82	206.6	
3-5-82	160.3	
3-25-82	245.0	
3-30-82	108	
4-21-82	126.5	
5-11-82		330
6-3-82	274.3	
7-13-82	91.8	
8-10-82	121.2	
9-20-82	150.8	

ELKHART POLICE DEPARTMENT
ELKHART, INDIANA

non-responsive

00002713

The Selmer Company
Post Office Box 310 · Elkhart, Indiana 46515 · 219·522·1675



Selmer Co. - RCRA File
Contents

11/90

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ • INT190011379 REACKNOWLEDGEMENT

SELMER CO THE SELMER DIV
PO BOX 310
ELKHART IN 46515

INSTALLATION ADDRESS ➤

1119 N MAIN ST
ELKHART IN 46514

EPA Form 8700-12B (4-80)

09/28/81

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

000308 DEC 1980

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F IMT190011379 T/A 2 C 1

APPROVED: A

DATE RECEIVED (yr., mo., & day): 801120

I. NAME OF INSTALLATION

THE SELMER COMPANY, SELMER DIV.

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 PO BOX 310

CITY OR TOWN: 4 ELKHART — ST.: IN — ZIP CODE: 46515

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 1119 North Main Street

CITY OR TOWN: 6 ELKHART — ST.: IN — ZIP CODE: 46514

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title): 2 Cartwright, Clifton, Corp. Engr.

PHONE NO. (area code & no.): 219-522-1675

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 THE SELMER COMPANY

B. TYPE OF OWNERSHIP (enter the appropriate letter into box): M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

- [X] A. GENERATION
- [ ] B. TRANSPORTATION (complete item VII)
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.: IMT190011379

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

EPA Form 8700-12 (6-80)

NOV 20 1980

CONTINUE ON REVERSE

AUA 6/3/81

THE Selmer COMPANY

BOX 310, ELKHART, INDIANA 46514 AREA 219 264-4141

May 4, 1981 219 - 522 - 1675

Phone: 6-15-81 AC

EPA Region V
RCRA Activities
P. O. Box 7861
Chicago, Illinois 60680

Dear Sir:

I sent notification forms to your office for (2) of our Elkhart locations on November 20, 1980. The locations are the Selmer # 1 Plant at 1119 North Main Street and Lesher Brass Division (now identified as Vincent Bach Plant # 2) at 2100 Industrial Parkway. I did not provide the notification forms for these locations previously because both were exempt from the reporting requirements by 40 CRF Part 261.5. I applied for EPA ID numbers for both locations to satisfy our transporters requirement. We were told by VanWaters and Rogers, South Bend, Indiana that they would not haul away our Trichloroethylene sludge unless we provided a manifest and EPA ID number. The transporters request for a manifest and ID number is contrary to your notice from John McGuire (see attached copy.)

Please check your records to determine what progress has been made in processing our applications for ID numbers. Anything that can be done to expedite the processing of our notification forms would be appreciated. Please contact me at 219-264-1700 with any information you have concerning this matter.

Yours truly,

Clifton J. Cartwright

Clifton J. Cartwright:hmn
Corporate Engineer

~~REQUEST~~
IRREG.

MAY 11 1981

MAY 11 1981

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

6/3/81

REPLY TO ATTENTION OF:

NOTICE

TO: Hazardous Waste Notifiers In Illinois, Indiana, Michigan, Minnesota, Ohio and Wisconsin

SUBJECT: How to comply with the Federal Hazardous Waste Regulations-Basic Requirements, Documents, Reports

The Federal Hazardous Waste Regulatory Program will go into effect on November 19, 1980. Although all six States in Region V regulate hazardous waste in one way or another, none of these States have programs which have been authorized to operate in lieu of the Federal program. Thus, beginning on November 19, 1980, you must comply with the Federal regulatory program, as well as with any applicable State programs. In order to minimize duplicative requirements and to reduce any confusion or conflict resulting from the operation of both Federal and State programs, the Federal program will be managed by USEPA, Region V, in close coordination with the States. Within the next two years, all six States in Region V are expected to have their programs authorized. Once a State program becomes authorized, the Federal program will cease operating in that State, and the regulated community will only need to comply with the State program requirements.

The attached FACT SHEET should help you to understand the minimum requirements of the Federal program, including pre-transport requirements, the manifest system, transportation requirements, interim status standards for treatment, storage, and disposal facilities, and routine recordkeeping and reporting obligations. In addition, the FACT SHEET points out State requirements which may be confusing or seem to conflict with the Federal program.

YES
6/3/81

The FACT SHEET is not intended to be an exhaustive list of all of the requirements of either the Federal or State programs. For details of the Federal program, see the May 19, 1980, regulations, Federal Register 33066-33588, 40 CFR Parts 260-265 and 122-124. Copies of the regulations are available from:

USEPA, Region V,
RCRA Activities,
P.O. Box 7861
Chicago, Illinois 60680.
Telephone: (312) 353-2197.

To expedite the handling of your telephone inquiries and requests, please indicate the State in which you are operating, and ask for an RCRA Implementation Officer. You may also call Mr. Ed Cox at (513) 684-5362 for informational materials. Information on State programs is available from each State Hazardous Waste Regulatory Agency.

If you have any questions, please do not hesitate to call Waste Management Branch at (312) 353-2197, or write to the above address. We look forward to working with you in this most important environmental program.

Sincerely,

John McGuire
Regional Administrator

Enclosures

P.S. SPECIAL NOTE FOR TREATMENT, STORAGE AND DISPOSAL FACILITIES

Many RCRA notifiers have not yet received their EPA identification numbers, and because of that, have delayed submittal of their Part A permit applications. The Part A application may be submitted without your EPA identification number. EPA will add that number to your Part A application for you. This procedure will ensure that you are not denied the right to operate under interim status because of late filing of your Part A application.

6/3/81
GES

D. Small Quantity Generators -- If you are a small quantity generator as defined in 40 CFR Part 261.5 (See FR May 19, 1980, pg. 33120), you are exempt from the manifest system. However, you must either:

1. Ensure the delivery of the waste to a facility permitted, licensed or registered by the State to manage municipal or industrial waste.

2. Ensure the delivery of the waste to a USEPA interim status or permitted facility.

3. Treat or dispose of the waste on-site, if you are permitted, licensed or registered by the State to manage municipal or industrial waste.

II. Transporters

Transporters of hazardous wastes are 1) required to deliver hazardous waste only to RCRA permitted or RCRA Interim Status treatment, storage & disposal facilities, 2) required to comply with the manifest system, 3) responsible for discharges of hazardous waste during transport, and 4) responsible for assuming generator responsibilities under certain circumstances. See FR May 19, 1980, pg. 33150 to 33152 for all requirements.

A. Manifest -- The transporter must not accept hazardous waste from a generator unless the waste is accompanied by a manifest. (Small quantity generators as defined in 40 CFR Part 261.5 (See FR May 19, 1980, pg. 33120) are not required to manifest their wastes; small quantities of hazardous wastes may be transported without a manifest. Also see "Small Quantity Generators" above.)

The transporter must sign and date the manifest, and deliver the waste to the designated or alternate hazardous waste facility. The transporters must keep a copy of the manifest for three (3) years.

B. Discharges --

1. Clean up and Notice. In the event of a spill, transporters are required to clean up the spill to prevent potential hazards to human health or the environment. If required by 49 CFR Part 171.15, telephone notice must be given immediately to the National Response Center (800) 424-8802 or (202) 426-2675.

2) Reports. A written report, as required by 49 CFR Part 171.16, must also be sent within 15 days to:

Director
Office of Hazardous Materials Regulations
Materials Transportation Bureau
Department of Transportation
Washington, D.C. 20590.

THE Selmer COMPANY

BOX 310, ELKHART, INDIANA 46514 AREA 219 264-4141

May 29, 1981

EPA Region V
Waste Management Manager
RCRA Activities
P. O. Box 7861
Chicago, Illinois 60680

Dear Sir:

On May 4, 1981, I sent a letter to your office (see attached copy) requesting information on the progress of processing the ID number applications we submitted to your office on November 20, 1980. As I explained in my previous letter, the transporter we are dealing with has required us to provide an ID number and manifest before they will haul away the Trichloroethylene sludge we generate at the (2) Selmer Company locations.

As I mentioned earlier, we submitted the applications over six months ago with no reply from your office as yet. Please investigate this situation and issue the (2) ID numbers required as soon as you possibly can. If there are any questions or any additional information required, please call me at 219-264-1700.

Thank you for your prompt attention regarding this matter.

Yours truly,

Clifton J. Cartwright

Clifton J. Cartwright: hmn
Corporate Engineer

May 4, 1981

EPA Region V
RCRA Activities
P. O. Box 7861
Chicago, Illinois 60680

Dear Sir:

I sent notification forms to your office for (2) of our Elkhart locations on November 20, 1980. The locations are the Selmer # 1 Plant at 1119 North Main Street and Lesher Brass Division (now identified as Vincent Bach Plant # 2) at 2100 Industrial Parkway. I did not provide the notification forms for these locations previously because both were exempt from the reporting requirements by 40 CRF Part 261.5. I applied for EPA ID numbers for both locations to satisfy our transporters requirement. We were told by VanWaters and Rogers, South Bend, Indiana that they would not haul away our Trichloroethylene sludge unless we provided a manifest and EPA ID number. The transporters request for a manifest and ID number is contrary to your notice from John McGuire (see attached copy.)

Please check your records to determine what progress has been made in processing our applications for ID numbers. Anything that can be done to expedite the processing of our notification forms would be appreciated. Please contact me at 219-264-1700 with any information you have concerning this matter.

Yours truly,

Clifton J. Cartwright:hmm
Corporate Engineer

Mr. Rich Brown
and
Mr. Mat Michael
Groundwater protection Specialists
Elkhart County Health Dept.

What about the cyanide degreasing, and stripping of metals at the Selmer plant on North Main St.?

Where do they dump their refuse?

They clean their tanks every 3 or 4 months.

REQUEST TO CONDUCT SOIL BORING ON SELMER PROPERTY NORTH MAIN STREET

TYPE, SCOPE AND EXTENT OF TOTAL STUDY

The type of study is an exploratory soil boring investigation on the Selmer Property in which soil and water samples will be collected and analyzed for trichloroethylene (TCE) from one (1) sixteen (16)-foot deep 2-inch diameter soil boring.

The Excel Corporation has completed a soils investigation on Excel Property which has been reviewed by the Indiana State Board of Health, the City of Elkhart, and the City of Elkhart's consultant. It is their belief that borings in addition to those already completed be conducted to determine if there are other as yet unknown areas that need to be addressed, in particular borings closer to North Main Street. The boring on the Selmer Property will provide soil information in an area that has not yet been addressed. The proposed boring location is indicated on the attached aerial photo.

The additional information will be incorporated into the existing data base to make the area wide study more complete.

PROCEDURE TO BE FOLLOWED DURING THE INVESTIGATION

Subsequent to obtaining permission to enter Selmer property, 48-hour notice will be given to the appropriate Selmer official that the boring operation will begin. Prior to the day of the boring, an on-site inspection will be made to select a mutually agreeable location. Underground utilities will be located. The boring rig will enter the Selmer south parking lot from the North Main Street entrance at about 9:00 a.m. The boring operation will last approximately 2 hours. Any asphalt pavement being penetrated will be restored using "hot patch". All debris or soil will be removed from the boring location after boring completion. Any water originating from the boring operation will be contained or disposed of. Subsequent to the boring operation the survey crew will determine the ground surface elevation at the boring location.

FIELD PROCEDURES AND SOIL SAMPLING

Soil sampling will be accomplished by utilizing a truck mounted Mobile B-40L drilling rig, equipped with four inch (O.D.) continuous flight hollow stem augers. The sampling mechanism used in the test drilling will be split-barrel (split spoon) 2.0 inch O.D. and hollow stem augers using a percussion drive for advancement of the split-barrel soil sampler.

Stratified soil samples to be tested for TCE contamination will be composited into appropriately labeled, oven-baked, teflon-lined cap, pint jars by taking the soil from the split-spoon sampler from every four-foot interval of the boring. Each four-foot soil sample placed into the jar will be quickly capped after each soil placement and packed to the rim of the jar to eliminate air space thus reducing volatilization of the contaminants. The contents of the filled jar will be thoroughly shaken and placed into styrofoam ice chests containing frozen "blue ice", stored and transported at about 4°C.

An approximately 6-inch portion of the split spoon core will be deposited into separate pint jars for geological logging and grain size determinations. Following each four-foot sample collection, the split-spoon will be washed with warm water and soap, scrubbed, rinsed with organic free water, and rinsed again with methanol to avoid cross contamination between each four-foot strata.

Field blanks will accompany samples to detect extraneous handling and field sources of contamination. Following retrieval, samples will be transported to the laboratory under recommended chain of custody procedures where transfer of split portions of samples will be made into labelled vials filling vials completely (i.e. no head space) using a hollow glass coring tube. The vials will be the standard screw-cap 40 milliliter with teflon faced silicone septums recommended for volatile organic analysis.

If sufficient pore water is available in the soil sample at the 16 foot depth, this water will be transferred to the appropriate size vial and analyzed for trichloroethylene (TCE).

The vials containing split portions of sample will be placed in styrofoam containers containing blue ice packs and transported to the contract laboratory.

Soil boring operations and field sampling procedures will be performed in accordance with acceptable U.S. Environmental Protection Agency protocol and standard methods which include:

U.S. EPA Procedures Manual for Groundwater Monitoring at Solid Waste Disposal Facilities, EPA/530/SW-611 (August 1977).

U.S. EPA "Samplers and Sampling Procedures for Hazardous Waste Streams" EPA-600/2-80-018, January 1980.

Indiana State Board of Health "Subsurface Data Collection for Sanitary Landfill Planning and Design" March 1979.

U.S. EPA/NWWA "Manual of Groundwater Sampling Procedures" Robert S. Kerr Environmental Research Laboratory, 1981.

ASTM D-1586.

All soil boring operations will be performed under the direction of a qualified geotechnical engineer.

ANALYTICAL PROCEDURES AND RESULTS

Laboratory analysis of soil samples will be performed by Measurement Science Corporation (MSC), 300 Garden City Plaza, Garden City, New York and by WLS Laboratories, South Bend, Indiana. The samples will be shipped UPS next day service and upon arriving at the laboratory will be extracted and analyzed according to protocol established in the Federal Register "Guidelines Establishing Test Procedures for Analysis of Pollutants", 40 CFR Part 136 (December 3 and 18, 1979). Quality assurance will be performed as described in the Federal Register and in the Handbook for Analytical Quality Control in Water and Wastewater Laboratories (EPA-600/4-79-019. In addition, analytical procedures will be consistent with:

U.S. EPA "Sampling and Analysis Procedures for Screening of Industrial Effluents for Priority Pollutants", April 1977.

U.S. EPA "Methods for Chemical Analysis of Water and Wastes" (EPA-600/4-79-020).

U.S. EPA "Interim Methods for the Sampling and Analysis of Priority Pollutants in Sediments and Fish Tissue Analysis of Sediment for Volatile Organics", Environmental Monitoring and Support Laboratory, Cincinnati, Ohio.

Accordingly, trichloroethylene (TCE) concentrations will be determined using currently accepted, standardized analytical methodolology, consistent with the purge and trap gas chromatography (GC) procedure for purgeable volatile halocarbons (EPA Method 601).

Samples will be extracted with methanol. A portion of each extract will be diluted with water and extracted with isoctane. The final extracts will be analyzed by electron-capture gas chromatography.

The gas chromatography (GC) analysis will utilize three Varian Model 3700 gas chromatographs. (Varian Associates, Palo Alto, CA) and (Perkin Elmer 900 Series, Norwalk, CT).

QUALITY CONTROL

The ongoing quality control (QC) program will be adhered to throughout the actual sample analyses. Providing for reasonable assurance of the reliability of the analytical results, this QC program will incorporate the following:

- Daily calibration (RF verification) of the analytical system through the analysis of a TCE standard and comparison with the calibration control chart;
- Daily analysis of organic-free water (method blanks) to verify both a contamination-free system as well as the method detection limit;
- Analysis of method blanks immediately following highly concentrated samples, to monitor potential cross-contamination;
- Periodic analysis of reagent blanks to monitor for potential reagent contamination;
- Periodic analysis of TCE standards of varying concentration, to verify system response over the linear range;
- Transport, storage and analysis of field blanks (organic-free water) to monitor potential contamination in the sample handling and storage process;
- Periodic random analysis of duplicate samples (approximately 10%) to provide a statistically significant demonstration of analytical reproducibility;
- and, Periodic random analysis of spiked soil samples, to verify the results of the spike recovery studies in the initial method validation.

00002703

Clyde E. Williams & Associates, Inc.
1843 Commerce Drive · South Bend, Indiana 46628 · (219) 234-3126
Engineers · Planners · Photogrammetrists

July 5, 1983

Mr. John F. Kelly
Senior Counsel
North American Philips Corporation
1315 Directors Row
Fort Wayne, IN 46808

Reference: Soil Boring Easement
The Selmer Company, Elkhart, Indiana
North Main Street Location

Dear Mr. Kelly:

On behalf of the Excel Corporation which has authorized us to request permission to conduct soil borings on the Selmer Company property and in accord with the Selmer Company request for an indemnification statement, we are providing this letter. Please consider this letter as the written agreement you requested from Clyde E. Williams and Associates, Inc. (CEWA) indemnifying the Selmer Company from claims for property damage or personal injury arising from CEWA entry onto and activities conducted on Selmer property and to undertake repair of damage to Selmer property resulting from the boring operation.

CEWA will indemnify and save harmless the Selmer Company, its employees and agents from and against all liability, demands, claims, loss, cost, damage and expense by reason or on account of property damage, death and personal injury of whatsoever nature or kind arising out of, as a result of, or in connection with the performance of the soil boring operation contemplated hereby, which is occasioned by the negligent acts or omissions of CEWA, its employees or agents.

Your signature in the space provided below will indicate your acceptance. This Agreement and our return to you of a counter signed copy will constitute full acceptance by both parties.

Very truly yours,

James R. Brush, P.E.
Project Manager

Edgar Williams, Jr., P.E.
President

JRB/lf

ACCEPTED AND AGREED: THE SELMER COMPANY

By:_____

Title:_____

Date:_____

0000270.5

Clyde E. Williams & Associates, Inc.
1843 Commerce Drive · South Bend, Indiana 46628 · (219) 234-3126
Engineers · Planners · Photogrammetrists

July 5, 1983

Mr. John F. Kelly, Senior Counsel
North American Philips Corporation
1315 Directors ROW
Fort Wayne, IN 46808

Reference: Soil Boring Easement
Selmer Property, Elkhart, Indiana

Dear Mr. Kelly:

We are in receipt of your letter dated January 26, 1983 to Mr. James E. Traylor, Indiana State Board of Health, requesting that prior to permitting Clyde E. Williams & Associates to conduct soil borings on Selmer property that certain information and materials be made available to you. On behalf of Excel Corporation, we are submitting the requested information.

In general, we are requesting permission to conduct one (1) sixteen (16) foot deep 2-inch diameter soil boring in the parking lot or near the parking lot south of the Selmer property and testing the soil and pore water from the boring for trichloroethylene (TCE). The groundwater surface elevation will be determined in the bore hole. The only other activity planned to be undertaken on Selmer property is surveying of the boring location and ground elevation by a two-man survey crew.

The detailed information you requested is found in the attachments to this letter. The items described in the Attachments are:

1) detailed description of the type, scope and extent of the total study,

2) detailed description of the procedure that will be followed during the investigation,

3) detailed description of the field procedures for obtaining soil samples and groundwater samples for chemical testing,

CEMA

4) detailed description of the laboratory procedures for soil testing and groundwater sample testing,

5) the type of quality control or quality assurance that will be provided during the investigation and testing,

6) written agreement indemnifying the Selmer Company.

Also as you requested, Clyde E. Williams & Associates will locate utilities and carry and maintain property damage liability insurance to cover costs for repair of damages caused by drilling.

In addition, we will provide you with a copy of the results of the study conducted as soon as they are completed. We thank you for your consideration of this matter and we will appreciate a prompt response to our request.

Very truly yours,

JRB

James R. Brush, P.E.
Project Manager

JRB/tb

Copies: Mr. John [illegible], Excel Corporation
Mr. Robert [illegible] Sanders III
Mr. James [illegible], [illegible]

00002707

STATE OF INDIANA

INDIANAPOLIS

STATE BOARD OF HEALTH

AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206-1964

JAN 3 1 1983

Mr. James R. Brush, P.E.
Clyde E. Williams and Associates, Inc.
1843 Commerce Drive
South Bend, IN 46628

Dear Mr. Brush:

Re: Selmer Property Sampling

Contrary to my explanation at our meeting on January 24, 1983, it appears that the Selmer Company will require somewhat more than a release from liability before they will allow samples to be taken on their property.

It is our opinion that samples taken on the North Main Street Well Field property would be adequate to determine if contamination is emanating from or through Selmer property. It will be up to Excel and Durakool to determine if the Selmer samples are necessary to their intent. If they do so, we would expect Clyde E. Williams to provide the necessary information to Selmer.

Very truly yours,

James E. Traylor, Chief
Technical Support Branch
Division of Land Pollution Control

JT/tw

Mr. Rich Brown
and
Mr. Mat Michael
Groundwater protection Specialists
Elkhart County Health Dept.

What about the cyanide degreasing, and stripping of metals at the Selmer Plant on North Main St.?

Where do they dump their refuse?

They clean their tanks every 3 or 4 months.

REQUEST TO CONDUCT
SOIL BORING ON
SELMER PROPERTY
NORTH MAIN STREET

TYPE, SCOPE AND EXTENT OF TOTAL STUDY

The type of study is an exploratory soil boring investigation on the Selmer Property in which soil and water samples will be collected and analyzed for trichloroethylene (TCE) from one (1) sixteen (16)-foot deep 2-inch diameter soil boring.

The Excel Corporation has completed a soils investigation on Excel Property which has been reviewed by the Indiana State Board of Health, the City of Elkhart, and the City of Elkhart's consultant. It is their belief that borings in addition to those already completed be conducted to determine if there are other as yet unknown areas that need to be addressed, in particular borings closer to North Main Street. The boring on the Selmer Property will provide soil information in an area that has not yet been addressed. The proposed boring location is indicated on the attached aerial photo.

The additional information will be incorporated into the existing data base to make the area wide study more complete.

PROCEDURE TO BE FOLLOWED DURING THE INVESTIGATION

Subsequent to obtaining permission to enter Selmer property, 48-hour notice will be given to the appropriate Selmer official that the boring operation will begin. Prior to the day of the boring, an on-site inspection will be made to select a mutually agreeable location. Underground utilities will be located. The boring rig will enter the Selmer south parking lot from the North Main Street entrance at about 9:00 a.m. The boring operation will last approximately 2 hours. Any asphalt pavement being penetrated will be restored using "hot patch". All debris or soil will be removed from the boring location after boring completion. Any water originating from the boring operation will be contained or disposed of. Subsequent to the boring operation the survey crew will determine the ground surface elevation at the boring location.

TO

FIT

Selmer Co.

FIELD PROCEDURES AND SOIL SAMPLING

Soil sampling will be accomplished by utilizing a truck mounted Mobile B-40L drilling rig, equipped with four inch (O.D.) continuous flight hollow stem augers. The sampling mechanism used in the test drilling will be split-barrel (split spoon) 2.0 inch O.D. and hollow stem augers using a percussion drive for advancement of the split-barrel soil sampler.

Stratified soil samples to be tested for TCE contamination will be composited into appropriately labeled, oven-baked, teflon-lined cap, pint jars by taking the soil from the split-spoon sampler from every four-foot interval of the boring. Each four-foot soil sample placed into the jar will be quickly capped after each soil placement and packed to the rim of the jar to eliminate air space thus reducing volatilization of the contaminants. The contents of the filled jar will be thoroughly shaken and placed into styrofoam ice chests containing frozen "blue ice", stored and transported at about 4°C.

An approximately 6-inch portion of the split spoon core will be deposited into separate pint jars for geological logging and grain size determinations. Following each four-foot sample collection, the split-spoon will be washed with warm water and soap, scrubbed, rinsed with organic free water, and rinsed again with methanol to avoid cross contamination between each four-foot strata.

Field blanks will accompany samples to detect extraneous handling and field sources of contamination. Following retrieval, samples will be transported to the laboratory under recommended chain of custody procedures where transfer of split portions of samples will be made into labelled vials filling vials completely (i.e. no head space) using a hollow glass coring tube. The vials will be the standard screw-cap 40 milliliter with teflon faced silicone septums recommended for volatile organic analysis.

If sufficient pore water is available in the soil sample at the 16 foot depth, this water will be transferred to the appropriate size vial and analyzed for trichloroethylene (TCE).

The vials containing split portions of sample will be placed in styrofoam containers containing blue ice packs and transported to the contract laboratory.

Soil boring operations and field sampling procedures will be performed in accordance with acceptable U.S. Environmental Protection Agency protocol and standard methods which include:

U.S. EPA Procedures Manual for Groundwater Monitoring at Solid Waste Disposal Facilities, EPA/530/SW-611 (August 1977).

U.S. EPA "Samplers and Sampling Procedures for Hazardous Waste Streams" EPA-600/2-80-018, January 1980.

Indiana State Board of Health "Subsurface Data Collection for Sanitary Landfill Planning and Design" March 1979.

U.S. EPA/NWWA "Manual of Groundwater Sampling Procedures" Robert S. Kerr Environmental Research Laboratory, 1981.

ASTM D-1586.

All soil boring operations will be performed under the direction of a qualified geotechnical engineer.

ANALYTICAL PROCEDURES AND RESULTS

Laboratory analysis of soil samples will be performed by Measurement Science Corporation (MSC), 300 Garden City Plaza, Garden City, New York and by WLS Laboratories, South Bend, Indiana. The samples will be shipped UPS next day service and upon arriving at the laboratory will be extracted and analyzed according to protocol established in the Federal Register "Guidelines Establishing Test Procedures for Analysis of Pollutants", 40 CFR Part 136 (December 3 and 18, 1979). Quality assurance will be performed as described in the Federal Register and in the Handbook for Analytical Quality Control in Water and Wastewater Laboratories (EPA-600/4-79-019. In addition, analytical procedures will be consistent with:

U.S. EPA "Sampling and Analysis Procedures for Screening of Industrial Effluents for Priority Pollutants", April 1977.

U.S. EPA "Methods for Chemical Analysis of Water and Wastes" (EPA-600/4-79-020).

U.S. EPA "Interim Methods for the Sampling and Analysis of Priority Pollutants in Sediments and Fish Tissue Analysis of Sediment for Volatile Organics", Environmental Monitoring and Support Laboratory, Cincinnati, Ohio.

Accordingly, trichloroethylene (TCE) concentrations will be determined using currently accepted, standardized analytical methodolology, consistent with the purge and trap gas chromatography (GC) procedure for purgeable volatile halocarbons (EPA Method 601).

Samples will be extracted with methanol. A portion of each extract will be diluted with water and extracted with isoctane. The final extracts will be analyzed by electron-capture gas chromatography.

The gas chromatography (GC) analysis will utilize three Varian Model 3700 gas chromatographs. (Varian Associates, Palo Alto, CA) and (Perkin Elmer 900 Series, Norwalk, CT).

QUALITY CONTROL

The ongoing quality control (QC) program will be adhered to throughout the actual sample analyses. Providing for reasonable assurance of the reliability of the analytical results, this QC program will incorporate the following:

- Daily calibration (RF verification) of the analytical system through the analysis of a TCE standard and comparison with the calibration control chart;
- Daily analysis of organic-free water (method blanks) to verify both a contamination-free system as well as the method detection limit;
- Analysis of method blanks immediately following highly concentrated samples, to monitor potential cross-contamination;
- Periodic analysis of reagent blanks to monitor for potential reagent contamination;
- Periodic analysis of TCE standards of varying concentration, to verify system response over the linear range;
- Transport, storage and analysis of field blanks (organic-free water) to monitor potential contamination in the sample handling and storage process;
- Periodic random analysis of duplicate samples (approximately 10%) to provide a statistically significant demonstration of analytical reproducibility;
- and, Periodic random analysis of spiked soil samples, to verify the results of the spike recovery studies in the initial method validation.

Clyde E. Williams & Associates, Inc.
1843 Commerce Drive · South Bend, Indiana 46628 · (219) 234-3126
Engineers · Planners · Photogrammetrists

July 5, 1983

Mr. John F. Kelly
Senior Counsel
North American Philips Corporation
1315 Directors Row
Fort Wayne, IN 46808

Reference: Soil Boring Easement
The Selmer Company, Elkhart, Indiana
North Main Street Location

Dear Mr. Kelly:

On behalf of the Excel Corporation which has authorized us to request permission to conduct soil borings on the Selmer Company property and in accord with the Selmer Company request for an indemnification statement, we are providing this letter. Please consider this letter as the written agreement you requested from Clyde E. Williams and Associates, Inc. (CEWA) indemnifying the Selmer Company from claims for property damage or personal injury arising from CEWA entry onto and activities conducted on Selmer property and to undertake repair of damage to Selmer property resulting from the boring operation.

CEWA will indemnify and save harmless the Selmer Company, its employees and agents from and against all liability, demands, claims, loss, cost, damage and expense by reason or on account of property damage, death and personal injury of whatsoever nature or kind arising out of, as a result of, or in connection with the performance of the soil boring operation contemplated hereby, which is occasioned by the negligent acts or omissions of CEWA, its employees or agents.

Mr. John F. Kelly
North American Philips Corporation

July 5, 1983

Your signature in the space provided below will indicate your acceptance. This Agreement and our return to you of a counter signed copy will constitute full acceptance by both parties.

Very truly yours,

James R. Brush, P.E.
Project Manager

Edgar Williams, Jr., P.E.
President

JRB/lf

ACCEPTED AND AGREED: THE SELMER COMPANY

By:_____

Title:_____

Date:_____

Clyde E. Williams & Associates, Inc.
1843 Commerce Drive · South Bend, Indiana 46628 · (219) 234-3126
Engineers · Planners · Photogrammetrists

July 5, 1983

Mr. John F. Kelly, Senior Counsel
North American Philips Corporation
1315 Directors ROW
Fort Wayne, IN 46808

Reference: Soil Boring Easement
Selmer Property, Elkhart, Indiana

Dear Mr. Kelly:

We are in receipt of your letter dated January 26, 1983 to Mr. James E. Traylor, Indiana State Board of Health, requesting that prior to permitting Clyde E. Williams & Associates to conduct soil borings on Selmer property that certain information and materials be made available to you. On behalf of Excel Corporation, we are submitting the requested information.

In general, we are requesting permission to conduct one (1) sixteen (16) foot deep 2-inch diameter soil boring in the parking lot or near the parking lot south of the Selmer property and testing the soil and pore water from the boring for trichloroethylene (TCE). The groundwater surface elevation will be determined in the bore hole. The only other activity planned to be undertaken on Selmer property is surveying of the boring location and ground elevation by a two-man survey crew.

The detailed information you requested is found in the attachments to this letter. The items described in the Attachments are:

1) detailed description of the type, scope and extent of the total study,

2) detailed description of the procedure that will be followed during the investigation,

3) detailed description of the field procedures for obtaining soil samples and groundwater samples for chemical testing,

CEWA

4) detailed description of the laboratory procedures for soil testing and groundwater sample testing,

5) the type of quality control or quality assurance that will be provided during the investigation and testing,

6) written agreement indemnifying the Selmer Company.

Also as you requested, Clyde E. Williams & Associates will locate utilities and carry and maintain property damage liability insurance to cover costs for repair of damages caused by drilling.

In addition, we will provide you with a copy of the results of the study conducted as soon as they are completed. We thank you for your consideration of this matter and we will appreciate a prompt response to our request.

Very truly yours,

JRB

James R. Brush, P.E.
Project Manager

JRB/tb

Copies: Mr. John Burt, Excel Corporation
Mr. Robert T. Sanders III
Mr. James Traylor, ISBOH

STATE OF INDIANA

STATE BOARD OF HEALTH

AN EQUAL OPPORTUNITY EMPLOYER

INDIANAPOLIS

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206-1964

JAN 3 1 1983

Mr. James R. Brush, P.E.
Clyde E. Williams and Associates, Inc.
1843 Commerce Drive
South Bend, IN 46628

Dear Mr. Brush:

Re: Selmer Property Sampling

Contrary to my explanation at our meeting on January 24, 1983, it appears that the Selmer Company will require somewhat more than a release from liability before they will allow samples to be taken on their property.

It is our opinion that samples taken on the North Main Street Well Field property would be adequate to determine if contamination is emanating from or through Selmer property. It will be up to Excel and Durakool to determine if the Selmer samples are necessary to their intent. If they do so, we would expect Clyde E. Williams to provide the necessary information to Selmer.

Very truly yours,

James E. Traylor, Chief
Technical Support Branch
Division of Land Pollution Control

JT/tw

Carl

- At Selmer for 6 mos.
- 2½ yrs ago supplying

Relocate old water treatment process

Cecil Zimmerman - Selmer

production people -
dumping degreasing fluid in truck lines

Maint. foreman

excel - bonderizing
'76-'80